

ESTTA Tracking number: **ESTTA671593**

Filing date: **05/11/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221293
Party	Defendant KoKo, Amber-LeVonne
Correspondence Address	KOKO, AMBER-LEVONNE 5225 CANYON CREST DR STE 71-295 RIVERSIDE, CA 92507-6301 info@donkeyland.org
Submission	Motion to Extend
Filer's Name	Matthew H. Swyers
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Signature	/Matthew H. Swyers/
Date	05/11/2015
Attachments	Motion for Extension of Time to File Answer.pdf(89149 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board

In the matter of Ser. No. 86/213,968;
For the mark DONKEYLAND RESCUE and Design;

The American National Red Cross,	:	
	:	
Opposer,	:	
	:	
vs.	:	Opposition No. 91221293
	:	
Amber LeVonne-Koko,	:	
	:	
Applicant.	:	

MOTION FOR AN EXTENSION OF TIME TO ANSWER

COMES NOW Applicant, Amber LeVonne-Koko (hereinafter “Applicant”), by counsel, hereby files the instant Motion for an Extension of Time to Answer the Notice of Opposition filed in the above-referenced matter until June 9, 2015. In support of the instant motion Applicant states as follows:

Statement of Facts

1. The instant opposition proceeding was instituted by Opposer, The American National Red Cross (hereinafter “Opposer”) on or about March 31, 2015.
2. The deadline for Applicant to file an Answer to the Notice of Opposition is on or about May 11, 2015.
3. Applicant’s counsel requires additional time to consider its options, defenses, and otherwise and to contact opposing counsel to determine what, if any, avenue for resolution of the instant matter may be considered.

Motion

The time for filing an answer may be extended on motion granted by the Board for good cause shown. *See* TBMP §§ 310.03(c), 509.01(a). A motion to extend must set forth with particularity the facts said to constitute good cause for the requested extension. *See* TBMP § 509.01(a).

In the instant case, Applicant seeks additional time to file its Answer to permit it to determine its possible defenses, whether they will defend the case on its merits, and to conduct factual research

concerning the Opposer's allegations so as to provide a true and accurate Answer to the enumerated contentions contained in the Notice of Opposition filed in this matter.

This request is not being sought to delay the proceedings herein.

Conclusion

WHEREFORE for good cause shown Applicant, Amber LeVonne-Koko, by counsel, prays that it be granted an extension of time to file their answer in this matter until June 9, 2015.

Respectfully submitted this 11th day of May, 2015.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

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Counsel for Applicant

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	:	
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this 11th day of May, 2015, to be served, via first class mail, postage prepaid, upon:

The American National Red Cross
Federal Chartered Instrumentalit
2025 E Street, N.W.
Washington DC, 20006

/Matthew H. Swyers/
Matthew H. Swyers